# UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Case No. 19-cr-142-LM
NATHAN CRAIGUE,	)	
	)	
Defendant.	)	

## **SUPERSEDING INDICTMENT**

The Grand Jury charges:

#### COUNT 1

18 U.S.C. § 1001 False Statement to Federal Agent

On or about August 28, 2018, in the District of New Hampshire, the defendant,

#### NATHAN CRAIGUE,

in a matter within the jurisdiction of the executive branch of the Government of the United States, namely, an investigation by the Occupational Safety and Health Administration ("OSHA"), U.S. Department of Labor, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation, by stating to an OSHA Compliance Safety & Health Officer that KM, who had died as a result of a workplace accident earlier that day, and NF were subcontractors and were not employees of the defendant or his business, when, in truth and in fact, as the defendant then and there knew, KM and NF were employees and not subcontractors.

In violation of Title 18, United States Code, Section 1001(a)(2).

## **COUNT 2**

# 18 U.S.C. § 1001 False Statement to Federal Agent

On or about October 24, 2018, in the District of New Hampshire, the defendant,

#### NATHAN CRAIGUE,

in a matter within the jurisdiction of the executive branch of the Government of the United States, namely, an investigation by the Occupational Safety and Health Administration ("OSHA"), U.S. Department of Labor, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation, by stating to an OSHA Compliance Safety & Health Officer that KM and CE were not employees of the defendant or his business, specifically, when the Officer asked him whether KM and CE were employees of his company, the defendant stated, "I've always treated them – they would come and go as they please, so I would always treat them as not employees," when, in truth and in fact, as the defendant then and there knew, KM and CE were employees and not subcontractors.

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL

Date: March 22, 2021 /s/ Foreperson
Foreperson

JOHN J. FARLEY Acting United States Attorney

By: /s/ John S. Davis
John S. Davis
Anna Dronzek
Aaron Gingrande
Assistant United States Attorneys